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9 *Attorneys for Plaintiff*
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11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13

14 Miriam Goldberg,) Case No.: 3:24-cv-4525
15 Plaintiff,)
16 v.) UNILATERAL STIPULATION AND
17 TeachBK, Inc., <i>et al.</i> ,) [PROPOSED] ORDER FOR REMOTE
18 Defendants.) HEARING
19) Date: January 27, 2026
) Time: 10:30 a.m.
) Courtroom: Room G, 15th Floor
) Judge: Hon. Lisa J. Cisneros
20)

21 Plaintiff Miriam Goldberg stipulates as follows:

22 Ms. Goldberg stipulates and requests that the hearing on Plaintiff's Motion for
23 Sanctions against Defendant Ilya Kiselev [ECF No. 69] scheduled for January 27, 2026 at
24 10:30 a.m. be held remotely. As grounds, Ms. Goldberg states that, on information and belief,
25 Mr. Kiselev has departed from the United States and is unable to attend in person. [*See id.* at 1
26 n.1]. Ms. Goldberg also advises the Court that Mr. Kiselev has difficulty speaking English and
27 may need an interpreter for the hearing, if held.
28

1 The undersigned has endeavored to obtain permission to file a joint stipulation to this
2 effect, explaining to Mr. Kiselev that he would otherwise need to appear in person in San
3 Francisco for the hearing. In response, Mr. Kiselev wrote to the undersigned: "I do not object to
4 the hearing being held via Zoom. However, I do not authorize you to add my signature or
5 represent that I have stipulated to any relief."

6 IT IS SO STIPULATED.

7 Dated: January 7, 2026

Respectfully submitted,

8 SLATER LEGAL PLLC

9 By: /s/ James M. Slater

James M. Slater (admitted *pro hac vice*)

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11 *Attorney for Plaintiff Miriam Goldberg*

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13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on January 7, 2026 a true and correct copy of this document will be
15 served on Defendants Ilya Kiselev and Andrey Burtsev via email, with a copy delivered by
16 email to Alla Vorobets, for forwarding purposes.

17
18 /s/ James M. Slater

James M. Slater

[PROPOSED] ORDER

Pursuant to Plaintiff Miriam Goldberg's unilateral stipulation, the grounds raised therein, and good cause appearing, the Court ORDERS that the hearing on Plaintiff's Motion for Sanctions [ECF No. 69] be held remotely via Zoom on January 27, 2026 at 10:30 a.m.

Dated: _____

HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE